

Exhibit 3

(Filed Under Seal)

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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA
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In Re Bard IVC Filters Products
Liability Litigation
No. MD-15-02641-PHX-DGC

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DO NOT DISCLOSE - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

VIDEOTAPED DEPOSITION OF TIMOTHY A. FISCHER

TAKEN AT: Quarles & Brady
LOCATED AT: 411 East Wisconsin Avenue
Milwaukee, WI

March 29, 2017
8:38 a.m. to 3:08 p.m.
REPORTED BY ANITA K. FOSS
REGISTERED PROFESSIONAL REPORTER

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1 of days I spent sitting in physician's offices
2 having long conversations.

3 Q. And Dr. Riebe, if I'm pronouncing his
4 name right, is the doctor that implanted the filter
5 in this case. Do you have any recollection of
6 having any conversation with him ever about IVC
7 filters?

8 A. I don't -- I don't know who he is. I
9 don't recall ever meeting him.

10 Q. And so because you don't recall him, I
11 assume you have no recollection that you ever
12 provided him any brochures or pamphlets related to
13 the Recovery filter?

14 A. I don't recall ever providing him any of
15 those things.

16 Q. I want to go over a few of the documents.
17 I'm not going to go over all 25, just a handful of
18 the documents that you were shown today. Let's
19 look at Exhibit 10, which was a memo from Temple.
20 And at the very top of that document it says,
21 "Review of FDA manufacturing user facility device
22 experience database, MAUDE." So the MAUDE database
23 is something that we talked about earlier today?

24 A. Yes.

25 Q. And that information that was available